

EXHIBIT D

From: Nathan Chapman
Sent: Tuesday, March 7, 2023 10:33 PM
To: lmccathern@mccathernlaw.com
Cc: C. Celeste Creswell; Kendall Kelly Hayden (khayden@cozen.com); Matt Hayes
Subject: Re: Irvin

Levi, we have communicated your request to our client and will get back to you once we hear back.

Thanks,

Nate

Sent from my iPhone

On Mar 7, 2023, at 12:40 PM, Nathan Chapman <nchapman@kcozlaw.com> wrote:

Levi,

It was good to meet you today. As per our discussion, we believe the inspection fully complies with Rule 34 and the court's order. To the extent you have concerns in that regard, we invite you to confer with us on the specific areas in which you believe the production was non-compliant. In the further interest of attempting to resolve a potential dispute without further court intervention, I will speak with my client today regarding your request to share the video with the NFL and whether we can provide you with copies of the videos pursuant to an appropriate protective order. As I mentioned today, my client's preeminent concern is the safety and privacy of its employees and guests, several of whom appear on the video and whose interests may be compromised by public disclosure of the video.

We'll be in touch once I have a chance to speak with my client.

Thanks,

Nathan D. Chapman
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